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8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

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11 LHF PRODUCTIONS, INC., a Nevada
12 Corporation,

13 Plaintiff,
14 vs.
15 BRIAN KABALA, an individual.
16 Defendants.

17 Case No.: 2:16-cv-02028-JAD-NJK

18 **STIPULATION AND ORDER TO EXTEND
19 THE PLAINTIFF'S DEADLINE TO
20 RESPOND TO DEFENDANT'S MOTION
21 TO COMPEL AND TO EXTEND THE
22 DEFENDANT'S DEADLINE TO RESPOND
23 TO THE PLAINTIFF'S MOTION TO
24 DISMISS**
25 **[FIRST EXTENSION]**

26 *And related counter-claims*

27 COMES NOW Plaintiff LHF PRODUCTIONS, INC. (“Plaintiff”) and Defendant
28 BRIAN KABALA (“Defendant”), by and through their respective counsel of record, and hereby
stipulate and agree to: (1) extend the time by which the Plaintiff must respond to the Defendant’s
Motion to Compel Written Discovery Responses, filed on January 30, 2018 [ECF No. 112] (the
“Motion to Compel”); and (2) extend the time by which the Defendant must respond to the
Plaintiff’s pending Motion to Dismiss the Defendant’s Amended Counter-Claims, filed on
February 9, 2018 [ECF No. 120] (the “Motion to Dismiss”), agreeing as follows:

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PROCEDURAL BACKGROUND

1. On January 30, 2018, Defendant filed the Motion to Compel, thereby rendering the Plaintiff's response due by February 13, 2018.

2. On February 9, 2018, Plaintiff filed its Motion to Dismiss. Per the Court's February 21, 2018 Minute Order (ECF No. 121), Defendant's response is due by February 26, 2018.

3. The Plaintiff and Defendant now hereby stipulate to: (i) extend the deadline for the Plaintiff to respond to the Motion to Compel to Friday, February 16, 2018; and (ii) extend the deadline for the Defendant to respond to the Motion to Dismiss to Monday, March 12, 2018.

4. This is the **First Request** for any extension of any of the foregoing deadlines.

5. This request is made in good faith and not made for the purpose of undue delay.

GOOD CAUSE STATEMENTS

6. Plaintiff seeks additional time to respond to the Motion to Compel, noting that Plaintiff's counsel has suffered certain medical conditions in recent weeks that have caused him to miss several days of work in the intervening time since the filing of Defendant's Motion to Compel and further disrupt his intended work schedule.

7. Defendant seeks additional time to respond to the Motion to Dismiss, noting that Defendant's lead counsel was on a pre-planned vacation at the time of the filing of the Motion to Dismiss and will not return until February 15, 2018.

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1 WHEREFORE, subject to the Court's approval below, Plaintiff LHF PRODUCTIONS,
 2 INC. and Defendant BRIAN KABALA hereby stipulate and agree to: (i) extend the deadline for
 3 the Plaintiff to respond to the Motion to Compel from Tuesday, February 13, 2018 to Friday,
 4 February 16, 2018; and (ii) extend the deadline for the Defendant to respond to the Motion to
 5 Dismiss from Friday, February 22, 2018 to Monday, March 12, 2018. Both parties will receive
 6 an equivalent extension to file their respective Reply briefs.

7 *Respectfully submitted February 13, 2018*

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 18 Brian Kabala

19 ORDER

20 Based on the parties' stipulation [ECF No. 122] and good cause appearing, IT IS HEREBY
 21 ORDERED that (i) the Deadline for the Plaintiff to respond to the Defendant's pending Motion to
 22 Compel is hereby extended to Friday, February 16, 2018; and (ii) the deadline for the Defendant
 23 to respond to the Plaintiff's pending Motion to Dismiss is hereby extended to Monday, March 12,
 24 2018. Both parties will receive an equivalent extension to file their respective Reply briefs.

25 **IT IS SO ORDERED.**

26 Dated: Las Vegas, Nevada _____.

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UNITED STATES MAGISTRATE JUDGE